

EXHIBIT 3

THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS

VESTA CORPORATION,

Plaintiff

VS.

VESTA MANAGEMENT SERVICES,
LLC

Defendant

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CIVIL ACTION NO. 4:15-CV-
00719

JURY TRIAL DEMANDED
INJUNCTION REQUESTED

**DEFENDANT, VESTA MANAGEMENT SERVICES, LLC'S RESPONSES TO
PLAINTIFF'S REQUEST FOR ADMISSIONS**

TO: Plaintiff, Vesta Corporation, by and through its attorneys of record, Richard S. Order, Adam B. Marks and Christopher A. Klepps, Upkike, Kelly & Spellacy, P.C., Hartford, CT.

Plaintiff, Vesta Corporation, by and through its attorneys of record, Ethan G. Gibson and Thomas M. Fulkerson, Fulkerson Lotz, LLP, Houston, TX.

Defendant, **Vesta Management Services, LLC**, serves its Responses to Plaintiff's Request for Admissions.

Respectfully submitted by,

DONATO, MINX, BROWN & POOL, P.C.



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ATTORNEY FOR DEFENDANT

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the above instrument was sent to the following attorneys-of-record by U.S. certified mail, return receipt requested, hand delivery, and/or fax transmission on this the this 10th day of July, 2015.

VIA FACSIMILE (860) 548-2680

Richard S. Order
Adam B. Marks
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A. SCOT CHASE

RESPONSES TO PLAINTIFF'S REQUEST FOR ADMISSIONS

REQUEST FOR ADMISSION NO. 1:

Admit that the VESTA service mark is registered to plaintiff Vesta Corporation by the United States Patent and Trademark Office, Registration No. 253779.

RESPONSE: **Admit**

REQUEST FOR ADMISSION NO. 2:

Admit that Defendant Vesta Management uses the word "Vesta" in advertising and promoting its business, including on its website, www.vesta24-7.com.

RESPONSE: **Admit**

REQUEST FOR ADMISSION NO. 3:

Admit that Plaintiff Vesta Corporation has not expressly authorized or given permission to Defendant Vesta Management to use the VESTA service mark, Registration No. 253779.

RESPONSE: **Admit**

REQUEST FOR ADMISSION NO. 4:

Admit that information concerning Plaintiff Vesta Corporation's Park Southern Apartments and Villages of Chesapeake/Avalon in Washington, D.C. appeared on Defendant Vesta Management's website or mobile website in or about March 2015.

RESPONSE: **Admit**